

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW HAMPSHIRE

Joseph Ferraro,)	
Plaintiff)	C.A. NO. 1:18-cv-01014-JD
)	
)	
v.)	
)	
Home Depot, U.S.A., Inc.)	
Defendant)	

JOINT STATEMENT ON THE STATUS OF DISCOVERY

NOW COME the plaintiff Joseph Ferraro, and defendant Home Depot, U.S.A. Inc. (“Home Depot”), through their respective counsel, and pursuant to the Court’s February 5, 2019 Order, submit this Joint Statement on the Status of Discovery. In support thereof, the parties state as follows:

1. The parties do not request a discovery status conference before the Court.
2. The defendant has served its Rule 26 Initial Disclosure on the plaintiff.
3. The plaintiff has served his Rule 26 Initial Disclosure on the defendant.
4. The plaintiff has answered written discovery in the form of Interrogatories and Requests for Production that were propounded by the defendant.
5. The defendant has answered written discovery in the form of Interrogatories and Requests for Production that were propounded by the plaintiff.
6. There is no discovery of electronically stored information (“ESI”) that has occurred or is anticipated to occur. This case does not require ESI.
7. Plaintiff’s deposition is scheduled for September 5, 2019.

8. The deposition of the Home Depot manager who spoke to the plaintiff after his alleged incident is scheduled to occur on or about September 11, 2019.

9. The parties anticipate that several more depositions may be conducted, such as the deposition of the plaintiff's neighbor, and the plaintiff's employer.

10. The parties do not anticipate filling any summary judgment motions.

11. Pursuant to the Joint Mediation Statement filed with the Court, the parties anticipate mediating this case on or before October 31, 2019.

12. The parties do not anticipate any barriers to discovery that would prevent completion of discovery by the discovery deadline of November 8, 2019.

Respectfully submitted,

The Defendant, Home Depot U.S.A., Inc.
By its Attorneys,

Dated: 8/30/2019

By: /s/ Ryan D. Landry
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The Plaintiff, Joseph Ferraro
By his Attorneys,

Dated: 8/30/2019

By: /s/ Mark Morrisette
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CERTIFICATE OF SERVICE

I, Peter L. Bosse/Ryan D. Landry, do hereby certify that pursuant to Federal Court Rules, I have this day served a true copy of the foregoing electronically on the Court's Electronic Filing System to the following parties.

Counsel for Plaintiff

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Dated: 8/30/2019

By: /s/ Ryan D. Landry
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